



American Electric Power
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AEP.com

June 20, 2016

Eleanor Kane
Environmental Engineer
Air Enforcement and Compliance Assurance
77 West Jackson Blvd. (AE-17J)
Chicago, IL 60604

Ethan Chatfield
Environmental Engineer
Air Enforcement and Compliance Assurance
77 West Jackson Blvd. (AE-17J)
Chicago, IL 60604

Re: AEP Generation Resources Inc. – Conesville Plant
FOV/NOV Dated June 8, 2016 - Request for Conference
Section 114 Information Request – Request for Partial Extension

Dear Ms. Kane and Mr. Chatfield:

AEP Generation Resources Inc. (AEP) respectfully requests an opportunity to confer with you regarding the NOV/FOV issued on June 8, 2016, alleging violations of specific provisions of the Ohio State Implementation Plan (SIP), the New Source Performance Standards (NSPS), and the Title V state operating permit for the Conesville Plant. The alleged violations, outlined in Paragraphs 22 through 25 of the NOV/FOV are all based on EPA Method 9 observations and/or “Method Alt-082” observations of visible emissions at the Unit 6 stack.

AEP lacks sufficient information to fully evaluate the merit of the allegations, and has previously submitted a Freedom of Information Act (FOIA) request seeking copies of any opacity observations performed at Conesville Plant as part of the site visit you made to the facility on April 5, 2016. That FOIA request was included in a letter addressed to your attention on April 19, 2016. The response received to that request did not include any documentation related to any opacity observations conducted on that date. We are advising the FOIA Office of the failure to fully respond to our initial request, and expanding the request to include other observations conducted by U.S. EPA, including but not limited to any documentation related to the observations conducted on the additional dates referenced in the NOV/FOV. A copy of that expanded FOIA request is enclosed.

Until those documents are produced we will be unable to provide a complete response to the NOV/FOV. Accordingly, we request that the date for any conference be scheduled no earlier than ten (10) days following our receipt of a complete response to the enclosed FOIA request.

In addition, at the same time the NOV/FOV was received at Conesville, we received a Section 114 request for information regarding the units at the Conesville Plant, including several items that are pertinent to your assessment of the validity of the allegations in the NOV/FOV. These include items such as excess opacity reports submitted to Ohio EPA, Quarterly Deviation and Compliance Monitoring Reports submitted in accordance with the requirements of the Title V permit for the Plant, visible emissions observations performed by plant personnel, and required stack testing reports for particulate matter (PM) emissions (which include information regarding opacity observations conducted at the time of these tests). Mr. Chatfield is listed as the contact for this information request.

The Section 114 Information Request contains many additional items that are unrelated to opacity or particulate emissions at Conesville, some of which cover time periods in excess of ten years. In an effort to promptly address the issues raised by the NOV/FOV, and allow prompt scheduling of a conference, AEP proposes to submit responses from the Conesville Plant to items 1-4 and 11, and a partial response to item 7 that includes all stack test reports for PM testing required to be performed at Conesville since 2005, within 30 days of our receipt of the request, or by July 13, 2016. We respectfully request a limited extension of time until August 12, 2016, to submit the remainder of the requested information for the Gavin and Conesville Plants.

Please contact me if you have any questions concerning this letter, to schedule a conference, and/or to discuss the enclosed FOIA request.

Very truly yours,



Janet Henry
Deputy General Counsel
American Electric Power Service Corporation

cc: Robert Hodanbosi, Chief, Ohio EPA Division of Air Pollution Control
Melissa Witherspoon, Acting Asst. Chief, Southeast District Office, Ohio EPA
John McManus, Vice President, Environmental Services Division